

Form 91-01
Rev. 2, 05/13/92

REVIEW OF TECHNICAL DOCUMENTS
REVIEW COMMENT RECORD

Post-It Fax Note	7671	Date	3/12/97	# of Pages	9
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Document Reviewed (Title, Number, Revision, Date, etc.)
Draft 779 Decommissioning Operations Plan, January 15, 1997, second rev.

Reviewer: [REDACTED]
Date: 03/26/97 Phone: (303) 966-6203
Organization: DOE/RFP/OCD
Agreement with Dispositions:
Date:
Reviewer:
Document Preparer:

1. M	Gen	Although improved from the previous version, this document is still not acceptable for the reasons discussed in the following comment. 1) Still does not explain the relationship of the hazards and risks to the work scope (activities) and schedule needed to meet the end points. Appendix 3 helps, but still lacks sufficient information to understand the relationship of the work to the hazards and risks. 2) The environmental and waste sections are better, but still do not provide the basic required information. 3) Lacks specific goals and schedule for reducing surveillance and maintenance and for AB reduction. 4) Since the deactivation work is not completed and the scope seems to change without explanation and apparently can be changed to fit unearned circumstances, this DOP should specify how the scope and estimate will be changed to accommodate the shifting end point. Also, schedule impacts that may be caused if the end points are not reached for critical path activities should be discussed.	
2. M	Gen	The scope of the DOP is not clear. Sometimes only B779 is mentioned, other times the cluster is included. Many examples including the waste estimates which do not appear to include all structures in the cluster.	
3. M	Gen	The cost estimates and basis should be included - preferably in an appendix.	
4. M	Gen	Due to the potential for the proposed privatization and/or Large Scale (technology) Demonstration to impact the scope, schedule, budget, as well as environmental protection, ARARs, etc., they must be discussed in sufficient detail to ensure the regulators and the public can determine the extent of any impacts.	
5. O	Gen	There does not appear to be good information/lessons learned exchange	



	TOC	<p>between the subchapters of this DOP and the 886 DOP based on the recurring deficiencies and issues.</p> <p>Also, there are still numerous typographical, spelling, and grammatical errors. Most are not identified in these comments, but I will lend the authors my marked up copy of the DOP which has many of them highlighted.</p> <p>The Working Group should review the draft guidelines on content and format requirements for Remedial Design Reports, and consider integrating it into the DOP format.</p>	
7.0	5	<p>L.1</p> <p>Move section 3 (overview) ahead of section 2 (organization and responsibilities).</p> <p>Delete "interim status" insert "not final critical." (No such thing as interim status under CERCLA.)</p> <p>Also, state that the DPP is still a draft being worked on by the Facility Disposition Working Group.</p> <p>Show 779-A and -B, since they are discussed in §12.2. See also comment 11.</p>	
8.0	9	<p>Fig. 12</p> <p>Identify and name the figures using standard format.</p>	
9.0	11	<p>Same question as before -- Is waste operations responsible for hazardous material as well as hazardous waste?</p> <p>Indicate what activities were formerly done what are done now. (Note: This version is much improved with regard to differentiating the ongoing and future activities from those that are no longer done, but the entire DOP still needs to be scrubbed.)</p> <p>Could not find Building 779-2 on Fig. 12. Need to go through document to ensure that all named buildings related to this cluster are shown on the figure.</p>	
10.M	16 and Gen	<p>3.1.1</p> <p>This section is generally not adequate for the reader to understand the risks or hazards. It needs more descriptive information and terminology should be standardized. Terms like "most extreme hazard," "high contamination," "low contamination," "no significant amounts," "dirty and contaminated," "hot spot," "most abundant contaminant," etc. used throughout the DOP are meaningless and indicates inadequate QA/QC was applied to the characterization or the summary is poorly written or both. Quantify or define the levels and/or define the risk or hazard.</p>	
11.M	19 and Gen	<p>3.1.1.2.</p>	
12.M	Gen		

13. M	20	3.1.2	As stated in comments on the earlier draft, this section should be put into table format to facilitate the risks and hazards being compared to decommissioning work to be performed. State what was done to characterize paint, cables, fluorescent light ballasts, small capacitors, etc. for PCBs, and where they were found.
14. M	Gen		State how many transformers contain PCBs in regulated concentrations, what the concentrations are, and location(s). Same comment as on earlier version - Always define what the "combination" consists of (Pb, Pb, U, selenium, PCBs, or combinations). There are numerous examples of where this clarification is needed.
15. G	21	3.1.2.1	What is the scope of "miscellaneous equipment and systems"? Does this mean all equipment and systems? Define.
16. M	21	3.1.2.2-2.6 and Gen	Do you mean "i.e." vs. "e.g."? Similar comment to #12. These sections discuss radiation sources having been stored in the rooms, but no mention is made as to whether known or suspected releases occurred and leaves the reader wondering if further assessment or action is needed.
17. M	Gen		Blank-->
18. M	21	3.1.2.4	What kind of batteries - Pb, NiCd? A few pounds or tons of them? Leaking or intact? Waste or not waste? Hazardous waste now or in the future? Second I, replace "qualified" with "regulated."
19. M	23	3rd has from bottom	Was the tank system including all ancillary equipment closed, or was this a partial closure? Is there any work or regulatory issue remaining? Will the crucibles, manifold, and ceramics be removed during deactivation or decommissioning? If not during deactivation, why?
20. G	35	3.1.2.45 and 3.1.2.49	Is the KCSA unit closed or will it be closed during deactivation or decommissioning? Closed or partially closed?
21. G	39	3.1.2.57	Decreases actions to be taken during decommissioning, which does not follow the existing format. Also, the use of temporary ventilation should be covered as a KNOWN

22. G	43	8th F	activity in the regulatory analysis section. Is there any possibility the contaminated equipment might be removed from 779 to another location for size reduction? If yes, modify to allow for doing so.
23. M	44	3.2.3	State when you're going to remove Pb or PCB contaminated paint. Discuss timing for AOCBM removal. Also, state if ALL this equipment has been completely drained of hazardous material (not just operationally empty). If not empty, state when that will be done. Is all waste from this activity included in the waste estimates? When do the PCB transformers and any capacitors and ballasts get removed? If the DCO process was used to complete the characterization, state how it was used. If it was not used, state what method was used. See suggested editorial changes on my copy of the draft. Was any additional sampling done?
24. M	45	4.1	
25. G	45-6	4.1-2	
26. G	47	4.2, 2nd	
27. M	47	4.2	Define "contaminant". It is often not clear if it means potentially released, Potential Contaminant of Concern, or actually released. For example, is the Co-60 source really a contaminant or is it just a hazardous material that needs special handling? Is there evidence of a PCB release from the transformers or are they contained as required in the transformer? Did the calciners or furnaces burn chlorinated solvents, and, if so, was the possibility assessed that they could have soot or filters containing dioxins, dibenzo-furans, or other toxic products of incomplete combustion? Why was the Co-60 source not removed during deactivation, since its removal was one of the end points? See earlier comment that there appears to be inadequate characterization of PCBs especially in paints, compressors, fluorescent light ballasts, and small capacitors. Need to explain that the characterizations in 4.3.5 are all parts of the characterizations listed in §4.1. Consider moving them as subsections into a new section 4.2 call "Types of Surveys" or something similar and change the current §4.2 to 4.3. Also, need to define "survey" to differentiate it from "characterization" and other terms. Do the characterization procedures already exist? If not, say if they'll be
29. G	49	4.6	

30. G	49	4.7	developed and when
31. M	49	4.7	Change title to "Documentation of Characterization Results" or similar. Will the referenced sampling procedure for samples from an RBA/CA be used for samples outside an RBA/CA? If not, what will be used? If yes, this would appear to be overkill and another, less strenuous procedure should be used.
32. G	49	4.7	Referencing 34.1, which report is the "final characterization report"?
33. M	50	5.0	This section is seriously deficient, and it remains inadequate. The phrase "most abundant contaminants" is unclear. Use a technically valid phrase.
34. M	50	5.1, 2nd	Also, cite the reference that states that the cleanup criteria for only the most abundant contaminants should be included. Otherwise include the criteria for ALL in this section.
35. M	51	5.3	This sub-section is improved over the previous version. Please verify the applicability of the HDS to equipment. Double-check the release criteria for Be. Confirm the "action level" is equivalent to the free release level.
36. M	51	5.4	Include ACM in the list of aerosols and distinguish it from ACM by defining both. Otherwise, standardize use of the term.
37. M	53	6.1	What WBS element is funding the asbestos work that will be done prior to decommissioning? Is the work defined in the B779 W/SIP? Use of the DOP as the AB authorization is unlikely at this time. Based on conversations with the RFO AB group, the draft DOP is significantly below the level of quality that would allow this. At a minimum, a fallback position should be stated with specific information on schedule or budget impacts.
38. M	58	7.1.2	Are all of the conditions in table 6.1 directly applicable to 779? Specify what "local and city regulations" apply to decommissioning operations involving 779 and say how they will be complied with. If any are applicable, is compliance with them covered in existing procedures?
39. M	58	7.1.3	The objective is not to "establish" a goal of zero lost time accidents; it should be to MEET the goal.
40. M	59	7.1.5	State when and how enhanced work planning is used for decommissioning.

41. M	60	7.2.1 7.3.1	Clarify if "work instruction" is the same as WCP. State who is responsible for ensuring the personnel are trained in accordance with the requirement's matrix. How often do they check the qualifications? What happens if someone is not trained -- cannot work? work under supervisor?		
42. G	61	7.4.1	Define "most extreme hazard."		
43. M	63	7.7.1	Describe how the site air and water quality monitoring is related to work area monitoring. Is the data shared with the decommissioning project manager or used otherwise? How? When? Why?		
44. G	64	8.3	Double-check the definition of "mixed waste." It is doubtful that it is only included if it contains "RCRA constituents" vs. the same criteria stated in definition in §8.4.		
45. M	65	8.6	This section is not adequate. It lacks the needed specificity for this very important subject. Also, it does not address built materials.		
46. M	65	8.7	This section is not adequate. It lacks specific information. It does not provide any level of confidence that the waste generated can be managed and disposed. It is not clear what is meant by the statement that the waste strategy will be approached on a room by room basis. Please describe the overall strategy for waste management for B779. Include where and for how long waste will be stored before it is disposed. Describe the process and the regulatory constraints and impacts (including reference to any existing procedures) for managing each waste type during the transition from deactivation to decommissioning and then from decommissioning to off-site shipment or disposal in a CAMU. (I had the same comment on the B886 DOP, so to save work you might want to check with Bob Gance at X5108 to see if they've already addressed it.) o 6/177		
47. M	65		Costs for waste management should be included in the budget estimate (which needs to be included in the DOP), but the costs should be shown separately to distinguish what the cluster is funding vs. what is funded by the waste management program. A similar section is needed to discuss removal and disposal of excess equipment, because it may be of nearly equal importance.		

48. M	66	8.9	Process chemical removal is an end point stated in the WSP. If they are not removed, the DOP should describe why not and include the scope and the cost for removing them.
49. M	67	Table 8.1	This table is not acceptable. This is the DOP, the CERCLA decision document, so there should be no TBDs, much less the large number shown in the table. It does not appear that the wastes from the entire cluster are included, and the title only says that it is for B779. Include the waste estimates for the entire cluster and include the management costs in the total estimate. Briefly describe how the estimates were prepared. For example, why is bulk waste for structural elements like walls and ceilings not included in most estimates? The table should include soil, non-hazardous waste (unabridgeable equipment, supplies, debris, etc.) and an explanation of how it will be managed and disposed.
71. M	71	9.2	Limit DOP to the TRAY
72. M	72	9.3	See comments from RCF DSN/VO.
73. M	76	9.4	The statement that the DOP includes NEPA values needs to be assessed by the RCFQ NEPA Compliance Officer. As written, it does not appear to address key NEPA-like issues, such as, waste management impacts including storage, transportation, and disposal and associated environmental impacts; air quality impacts; cost of the project compared to benefits and impacts; analysis of alternatives (would desulfurizing or only partial decommissioning be the preferred alternative); impact of sealing the facility to ground, but not immediately doing the ER work, etc.)
74. M	77	9.5	The air issues section remains unacceptably vague. The evaluation should have been completed and the results reported in the DOP. As written, this does not appear to meet the requirements of RCFCA for discussion of permits needed or not needed because the project is being done under CERCLA. The number and location of RCRA units is not evident. State how many existing units will be needed by the decommissioning program, which ones and why. (See related comment #46.) Will all units be closed or only partially closed. Are any associated with IHSSs or extend beyond the boundaries of the building? the cluster? This section remains incomplete. Some comments as before. The analysis

75.M	78	9.5	should already be completed and included in this DOR. Clarity: what is meant by, "Remediation of the destruction of the Building is required."
76.M	85	10.	This section provides some good information mixed with a large amount of generic, promotional verbiage. Significantly cut the excess.
77.M	86	10.2	Who approves the contractor's plans and when? Who determines if the equivalency requirement is met and what standards do they use? Reference the QA/QC procedures that apply. How is graded approach applied to the review?
78.M	87	10.3.2	See comment #41.
79.M	87	10.3.4	Despite the glowing statements about the quality and thoroughness of the QA program, its effectiveness is questionable. State the program's specific responsibility for the quality of this draft DOR, and list what documents the QA staff is responsible for reviewing and when they are required to perform the reviews (or summarize the QAP's requirements).
80.M	123	12.19	The format needs to be changed for this appearance, so the section numbering is not the same as that used in the body of the document.
81.M	128	1.0	Will the fuel cell tanks be removed during decontaminating? Are they included in the work scope and cost? This section is not clear as to the contamination type.
82.M	128	1.1	What new technologies will be assessed by the LSD, where will they do the work: what will the impacts be on scope, schedule, budget, and the environment, health and safety of workers and the public? This section needs a decision tree that narrows the selection of the technologies that will be used for decontamination. It is too broad as written.
83.M	136	1.3.2	The criteria given here for the decision on whether or not to decontaminate is not an exact match with the criteria in the waste minimization section (8.6). Establish and state the criteria. Also, the scope and budget need to reflect the requirement in RCRA for all readily removable radioactive contamination to be removed. What is the basis for the statement that some form of decontamination is needed in any decontaminating program? Are skipable ceilings applicable to highly porous substrates?

MAR-27-97 THU 17:28
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84. M	151	Apr. 3	Types of contamination appear to be arbitrarily selected. For example, why aren't all of the contaminants included? Respond to include them or explain the reasoning for leaving them out.		
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#1) Fred Gerdeeman

Section 3.1.3 of the DOP identify the potential radiological and chemical hazards which may encountered in each of the areas within the 779 cluster facilities. Section 3.2 of the DOP identifies the general approach to the decommissioning activities. The 779 Cluster Health and Safety Plan ^(HASP) contains the ^{initial project} exposure assessment which ^{was developed from the} review ^{of the} DOP sections. In addition to the initial exposure assessment more task specific evaluations (Activity Hazard Analysis - AHA's) are completed with, and become part of the work packages.

The safety analysis (Basis of Interim Operations - BIO) which will be part of the new Authorization Basis contains accident analyses for the 779 cluster decommissioning effort and FSL's which were written to be ^{eliminated as conditions no longer require their implementation} In addition, Section 9.4 has been revised and now contains the results of hazards analyses complete for the decommissioning activities at RFETS.

#1 2) The environmental and waste management sections have been revised. More explanation of the changes are in the responses to follow.

#1 3) Section 6.0, Authorization Basis Transition, has been revised to more accurately reflect the how the surveillance and maintenance functions will be reduced as the 779 Cluster facilities' hazards are reduced.

include all the 279 cluster facilities.

#3 A discussion of the schedule and cost estimate has been added as section 12.

#4 Some discussion of privatization and the Large Scale Technology Demonstration has been added but, there is too much uncertainty in how either of them will be implemented to put very much definition in the DOP. The ARARs ^{are independent of how the work is completed & who completes} ~~apply to any other sample~~ the work.

#5 There is no exchange of information as Building 886 does not have a DOP being developed. The Building 886 Work Summary Plan (WSP) is in the final stages of being developed. ~~but, the content~~ intent of the WSP & DOP are different and therefore the content of each would be different. The DOP will be thoroughly reviewed for spelling & grammar before the next issue.

#6 The Remedial Design Reports format is not implementable in its current configuration and ~~is~~ ^{will} not be used for the 279 cluster DOP.

Section 1 has been modified and provides more of a project overview. The sequence of section 2 and section 3 remain the same.

7 Section 1.1 has been revised to delete the use of "interim status".

DPP/DOF

added a statement referring to the parallel review process.

8 Modified Figure 1.2 to show 779-A and 779-B.

9 Organization chart has been labeled.

The Waste Operations Support personnel are responsible for Hazardous Material and Hazardous Waste as used and generated by the project.

10 There are no R & D related operations being completed in Building 779. Section 3.1.1 has been modified to reflect this fact.

11 Reference to 779-2 was of no added value & therefore deleted.

12 The terms identified were meant to give a relative feeling for radiological contamination and not a quantifiable assessment. Unless the general public had a background in health physics the difference between 1,000 decays per minute plutonium and 2,500 decays per minute plutonium would not mean much. A description of

#1 4) The Deactivation Program's Work Summary Plan ^(WSP) has been approved. To ensure the deactivation end points were ~~clearly~~ ^{sacitly} identified the decommissioning team completed a detailed walkdowns of the 779 cluster facilities. The team generated a room by room, cabinet by cabinet inventory of equipment, parts, tools, instruments, chemicals and other miscellaneous items (inside as well as outside glove boxes). The inventory was then converted into an end points document which defines who is responsible (deactivation or decommissioning) for disposition of the items. These endpoints are an attachment to the deactivation 779 cluster Work Summary Plan. ^{deactivation} ~~end~~ points have been used to refine the Equipment Removal section of the decommissioning Work Breakdown Structure.

In order to capture the scope of the decommissioning effort,

~~more detailed schedule has~~

#2 The DOP was reviewed and ~~changed~~ ^{some} sections were changed to help clarify the difference between 779 cluster & Building 779. Building 779 is the major facility within the 779 cluster and Building 779 contains the greater amount of hazards. Therefore, ^{using a graded} approach in the DOP, the majority of the discussions are focused on Building 779.

however does signify that there is probably a different set of controls for the two areas. The DOP has been reviewed & an attempt to use consistent terminology has been made.

A qualitative hazard assessment ^{of the 779 cluster decommissioning activities} have been added to Section 2 in table format. Section 7.4 discusses hazards due to decommissioning in a more quantifiable manner. The Basis of Interim Operations (BIO) discusses potential accidents & their consequences. See section 1a for a discussion of the 779 cluster BIO. In addition to these hazard assessments, each decommissioning task will be assessed by an AHA.

- #13 Added a discussion of PCBs in section 4.2. ^{No transformers in the 779 cluster contain PCBs.}
- #14 Revised DOP to indicate the type of contaminants in all locations where appropriate. In cases the term contaminant is meant to be any undesired substance.
- #15 Clarified the statement and corrected the e.g. reference.
- #16 The statement has been changed to indicate the sources were removed from the building. Even if the sources were removed a radiation survey & visual search ^{for sources} will be completed.
- #17 N/A
- #18 The statement has been modified to indicate the Pb-acid batteries were removed from the building during deactivation. Changed qualified to regulated. Tank was fully closed. No further action is required.

#19 These will be removed during decommissioning. Deactivation has stated that unless the item inside the gloveboxes are chemicals, SWM or beryllium, the item's removal is not in their scope of work.

#20 The satellite accumulation area in room 153 will be closed during decommissioning. The satellite accumulation area in room 155 will be closed during deactivation. These comments were added to appendix 3.

#21 Added the use of temporary ventilation to section 3.2.3. Moved the ^{statement} ~~section~~ in question from 3.1.2.57 to appendix 3.

#22 Yes. The section has been modified to clarify this point.

#23 The sequence of removing asbestos ^{was} ~~is~~ identified on page 42.

Added the potential for ^{removing} lead & PCB painted surfaces. The idle equipment ^{fluid} will be ~~removed~~ ^{drained} & flushed as necessary during deactivation. No hazardous fluids should be in Building 779 when it is released for decommissioning. The light ballasts will be removed when lights are removed. All wastes are in table 8.1 estimates.

#24 See section 4.1.2 for description of process used.

#25 Sections 4.1 & 4.2 have been revised.

#26 No. additional sampling was done solely for decommissioning. Additional routine ^{radiation} holdup, ^{verification} measurements were made.

#27 The DOP was modified to identify specific contaminants as appropriate. In some places the generic term ~~contaminant~~ is still used.

There is no record of a PCB release in the 779 cluster.

3 Dioxins

The Co^{60} source will be removed during decommissioning.

added section 4.7 to discuss the ~~two~~ sampling for PCBs.

#28 This section has been revised to clarify the phases of characterization and how characterization related to sampling & surveys.

#29 Procedures exist that provide guidance on how to sample & track (chain of custody) samples. A characterization procedure which helps to identify where to look for a particular contaminant, and how to determine sample locations does not exist. A Decommissioning Characterization Protocol ^{procedure} has been drafted and

#30 Changed title as suggested.

? #31 The referenced sentence has been removed. The requirement for chain of custody tracking has been retained.

L-6245-F "Sampling Procedure for Waste Characterization" is used outside ^{2BA.}

#32 The reference to a "brief" characterization report has been deleted. A summary of each sampling event will be contained in the sample instructions. This method of instruction development is contained in the new (drafted) Decommissioning Characterization Protocol procedure.

#33 Section 5 has been modified to more clearly indicate criteria which will be used for release of the facility.

#34 The EDE applies to the facility as left in place. If the scope of the project is not changed, no equipment will be left in place.

#35 This section has been modified slightly. The 25 ug/sg ft. triggers housecleaning actions as identified in the site HASP.

#36 ACM was added to ~~the~~ acronym list

asbestos is removed under the Dismantlement WRS definition. For Building 779 the WBS # is 1.1.06.14.04.03.01

asbestos will be removed prior to activities which would ~~be~~

The asbestos is not part of deactivation & therefore not defined in the WSP.

#37 The AB approach (and section 6) has been modified to use a BSO as the new AB.

The conditions in table 6.1 are only applicable to B779.

#38 The only known requirement is to obtain a demolition permit. The need to comply ^{with this} under CERCLA ^{is being} reviewed.

#39 Changed sentence as suggested.

#40 Section 7.15 was modified as suggested.

#41 Revised 7.3.1 to identify the job foreman as the person responsible to ensure training is complete. The project manager is the person who sets the requirements and is task with overall compliance.

#42 Section 7.4.1 ^{Work is not complete with untrained personnel.} has been modified for clarification.

#43 The site air & water quality monitoring are related to the decontamination efforts. ~~Loss~~ backup until the checked for the work areas ^{monitoring}. The site program is not used to replace work area monitoring. When the building containment (building structure) is removed the site monitoring is the sole source of release information. Personnel from the air & water quality groups are part of the project. Input to the project planning.

✓ #44 Changed "RCRA" to "hazardous"

#45 Section 8.6 has been expanded and now addresses bulk building materials. Add reference to the guiding document for waste minimization.

#46 Section 8.7 has been expanded as suggested. The following items have been added to 8.7 which are ~~not~~ ^{not} included in 9.7. This has been done to ensure that the "situation" described in 8.7 is covered. The LFA and EPA are mentioned in the discussion to section 8.7. The discussion in 8.7 has been revised.

#47 Discussion ^{of equipment management} has been added to section 8.7

#48 All excess chemicals were removed during deactivation.

#49 Table 8.1 has been modified as suggested. The details of how the waste estimates were generated has been added to section 8.7.

Comment numbers ^{skip from} 50 to 70. No resolutions can be made to missing comments.

#71 Section 9.2 was changed to state "LRA, EPA and public"

#72 Rick DiSalvo's comments are ^{being} responded to independent of these comments.

#73 Section 9.4 has been re-written to better address these concerns.
Added to address status of RCRA & IHSS areas.

#74 Section 9.5 has been revised.

#75 This section has been re-written.

#76 Section 10 has been modified to eliminate some verbiage.

#77 K-H Procurement Quality Assurance is responsible for approving subcontractor quality plans when requested by ERES. ~~etc~~

#78 Training requirements for project personnel are identified in the project specific training matrix. The Recommisioning Program Training Plan, RMR 004, identifies how training requirements are set up & followed from tracked.
For Quality Assurance personnel, the QA Manager administers the qualification requirements, on a yearly basis.

#79 QA has assisted in the development of the DOP and has reviewed and commented on the document in its entirety. RMR controls its documents per Site document control procedures and internal procedures, (ref. TWCP, I-MAN-001-SDRM, ~~RMR~~ RMR-QA-05.018).

#80 The appendix numbering has been changed to start with the appendix letters.

The ^{installed underground} diesel fuel oil tanks are currently being replaced by above ground tanks. The ~~below~~ underground tanks will be cleaned, flushed & foamed by the Underground Tank Replacement Project. Removal of the ~~new~~ above ground storage tanks is part of the 779 Cluster Decommissioning Project.

#81 The use of "contamination" in this context is meant to be general & cover different types of contaminants.

The technologies to be used for the LSD have not been selected. The impact to scope, schedule and budget can not be assessed until the technologies and their application have been determined.

This appendix is to provide an overview of different technologies. The specific technology to be used is discussed in section 3, (i.e. Strippable paint, sags & scabbling).

Section 8.6 has been revised. The ^{term} "readily removable radioactive contamination" is to be determined with the LRA as the project proceeds. Since this is not totally defined ahead of time there is some

#82 As explained in section B1.0, much of the material in appendix B is directly out of the DOE Decommissioning Handbook. The statement in question is from the handbook.

#83 The applicability to highly porous substrates is dependent on the desired outcome. The strippable paint can be used to help fix contamination as well as remove it.

#84 The appendix 3 characterization list is a summary of the more detailed reconnaissance level characterization information. The contaminants ^{were} listed because they are the ones expected to result in the most impact to the project's scope.